

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION**

	)	
In re	)	
	)	Chapter 11, No. 24-40213-EDK
ARIEL LLC	)	
	)	
Debtor	)	

**RESPONSE TO MOTION TO CONVERT**

To the **HONORABLE ELIZABETH D. KATZ**, Chief Bankruptcy Judge:

Now comes Ariel, LLC (the “Debtor”), a debtor-in-possession, under Chapter 11, Subchapter V of Title 11 of the United States Code (the “Bankruptcy Code”) in the above-captioned matter, and responds as follows to the Motion to Convert filed by the U.S. Trustee (Docket No. 196).

**INTRODUCTORY STATEMENT**

The Debtor has filed the Monthly Statements. These were finalized on February 14, 2025, and, on that date, the undersigned informed the U.S. Trustee that these had been prepared and were going to be filed. The Debtor also provided these to the U.S. Trustee, with bank statements, prior to the filing of the statements with the court. Although these statements should have been filed earlier, there were some personal issues delaying these filings.

**RESPONSE TO SPECIFIC PARAGRAPH ASSERTIONS**

1. – 12. Admitted, although, concerning Paragraph 12, the undersigned informed the U.S. Trustee that the monthly statements had been prepared and were to be forwarded/filed shortly.

13. – 15. As these paragraphs merely repeat the language of statutes, no response is required. The Debtor, however, admits that the U.S. Trustee has accurately stated the applicable sections.

16. The Debtor and undersigned have had personal issues pending. Regardless, the cash flow statements should have been filed timely.

17. – 19. As these paragraphs merely repeat the language of certain cases and are argumentative, no response is required. The Debtor, however, admits that the U.S. Trustee has accurately quoted the cases cited.

20. The Debtor does not believe that it has “ignored” or “flouted” its obligations. As the Debtor has reported to the U.S. Trustee at various times, there has been no income during the time at issues.

22.[sic] - 23. Admitted.

24. The Debtor admits that the requests are reasonable, but denies the other assertions of this paragraph.

25. Denied.

ARIEL LLC

Dated: February 19, 2025

/s/ Louis S. Robin  
Louis S. Robin (BBO545578)  
Law Offices of Louis S. Robin  
1200 Converse Street  
Longmeadow, MA 01106  
Tel No. (413) 567-3131

**Certificate of Service**

In accordance with the Electronic Case Filing (“ECF”) Administrative Procedures of the United States Bankruptcy Court for the District of Massachusetts, I, Louis S. Robin, hereby certify that the foregoing, filed through the ECF System, were sent electronically to the registered participants as identified on the Notice of Electronic Filing (or as otherwise designated below by electronic notice) and that copies were sent to those indicated as non-registered participants by first class mail on February 19, 2025.

/s/ Louis S. Robin

**Service List**

Richard C. Demerle on behalf of Creditor Harvest Now, LLC  
rdemerle@demerlepc.com, bankruptcy@DHNewEngland.com

David A Hill on behalf of Creditor EF Mortgage LLC  
dhill@fp LLP.com

Gary M. Hogan on behalf of Creditor RD CRB SPV LLC  
garyh@bbb-lawfirm.com, jessicac@bbb-lawfirm.com;kimberlyk@bbb-lawfirm.com

Gary M. Hogan on behalf of Creditor RD W SPV LLC  
garyh@bbb-lawfirm.com, jessicac@bbb-lawfirm.com;kimberlyk@bbb-lawfirm.com

Richard King  
USTPRegion01.WO.ECF@USDOJ.GOV

David B. Madoff  
alston@mandkllp.com, MA28@ecfcbis.com

Jason McGuire on behalf of Creditors Evelyn Reyes Paxtxot, Enmanuel Ventura, Myrna J. Percibal, and Jerson Espaillat, Jr.; jason@mcardlelaw.com

Stephen E. Meunier on behalf of Assistant U.S. Trustee Richard King  
stephen.meunier@usdoj.gov

Linda St. Pierre on behalf of Creditor Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as trustee of NLT 2021-INV1 Trust  
bankruptcyecfmail@mccalla.com, mcallaecf@ecf.courtdrive.com

Tatyana P. Tabachnik on behalf of Creditor Harvest Now, LLC  
ttabachnik@demerlepc.com, bankruptcy@dhnewengland.com

Tiffany L. Stichel on behalf of Creditor Schlossberg, LLC  
tstichel@schlossbergllc.com

Steven Weiss on behalf of Creditor Harvest Now, LLC  
sweiss@ssfpc.com, astephan@ssfpc.com